



North Central Texas Council Of Governments

November 1, 2012

Mr. David S. Turetsky, Chief
Public Safety and Homeland Security Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Facilitating the Deployment of Texting to 9-1-1, Docket No. 11-153

Dear Mr. Turetsky:

On behalf of the NCTCOG 9-1-1 Regional Program, I would like to thank the Commission for their research and consideration regarding the ability to text 9-1-1. NCTCOG provides 9-1-1 services for 44 PSAPs in fourteen counties covering 12,000 square miles and over 1.6 million residents surrounding the Dallas Fort Worth Metroplex. Our region is home to 7 Colleges & Universities and a substantial Deaf & Hard of Hearing population.

A recent market study (December 2011 – TRIAD) showed that approximately 1/3 of our population believe they can text 9-1-1 today. We have had numerous lockdowns in our larger high schools as school violence is on the rise. The 9-1-1 infrastructure is not currently capable of handling the functionality and features of the many communication devices used by our citizens. Public expectations and public safety requires us to look for new technical solutions for reporting emergencies.

Our Deaf and hard of hearing community is crying out for equal access in contacting 9-1-1. Our college students and younger use texting as their primary form of communications and as they receive texts from their schools, they assume they can text 9-1-1 when they need help and we will be able to meet their needs. Texting is quickly replacing voice communications and the public safety industry need to catch up with public technology and receive these cries for help!

While examining a ruling for text to 9-1-1, I encourage the Commission to require solutions that will not place undue burden on PSAPs by requiring updated technology or carrier fees.

As we begin the journey towards Next Generation 9-1-1, it is anticipated that it will take years to implement across the country. Our public has a critical need for an interim solution specifically addressing text to 9-1-1 capabilities. We urge the FCC to take swift action to meet the safety needs of our citizens through a text to 9-1-1 interim solution!

Respectfully,

Christy Williams
9-1-1 Program Manager

/hp